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Ajit Pai, FCC Chairman  
Washington, DC

February 5, 2018  
Filing Comments to Lifeline Reform Plan

Dear Mr. Chairman:

I wish to file comments to the FCC Notice of Proposed Rulemaking, identified as *Bridging the Digital Divide for Low-Income Consumers*. My concern is the proposed reforms will do anything but address efforts to address the challenging, intractable, problem low-income consumers face in utilizing the internet effectively. Instead, the FCC plan potentially throws hundreds of thousands of Ohio families off of their limited lifeline services.

The FCC proposes to reverse most of the “Lifeline broadband” reforms adopted by the prior FCC leadership in 2016, reducing the Lifeline program’s utility for low-income families. The FCC changes would reduce funding, impose new costs and eligibility limits on low income households seeking to use the program and disrupt existing Lifeline services for at least two-thirds of current customers by banning their “non-facilities bases” providers from the program.

I would like to share some Ohio data. The FCC proposal would deny lifeline services from non-facilities based providers (the resellers of bandwidth on the big mobile networks). Among the barred companies are the two biggest resellers, TracFone and Q Link, which account for nearly 70% of Ohio Lifeline accounts. Approximately 325,000 households in Ohio could lose their current Lifeline connections if the FCC plan goes forward.

Thanks to the 2016 Lifeline broadband order, almost all these lifeline households get some Internet data as part of their Lifeline packages. While the service is far from robust broadband, it does offer the ability to access some important activities, like connecting parents and schools, patients and hospitals, provide some basis for social media activities and allow the pursuit of employment opportunities. It’s doubtful that most

of these households would be able to find equivalent service elsewhere, especially since AT&T will no longer be providing any Lifeline services in most of Ohio, including cities like Cleveland, and Spectrum (former Time Warner) can break family budgets.

To be clear, I oppose the proposed outright elimination of the Lifeline Broadband Provider designation created by the 2016 Lifeline Order and oppose the FCC's suggestion that the "digital redlining" of low income urban neighborhoods can be remedied by targeting enhanced Lifeline subsidies to encourage ETC infrastructure investment. I support the efforts of the National Digital Inclusion Alliance, which has also filed comments on these proceedings.

In the event you have questions, please do not hesitate to call or email me for further information. Thank you for your time and consideration.

Sincerely,

/KC/

Kevin Cronin